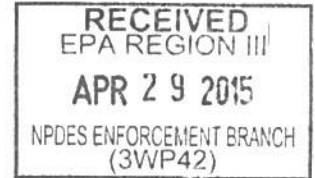




FILE

DEPARTMENT OF THE NAVY
NAVAL SUPPORT ACTIVITY WASHINGTON
1411 PARSONS AVENUE ST STE. 303
WASHINGTON NAVY YARD DC 20374-5003



5090
Ser N4/145
April 28, 2015

Ms. Ingrid Hopkins
EPA Region Regional III
NPDES Enforcement (3WP42)
1600 Arch Street
Philadelphia, PA 19103-2029

Ms. Hopkins:

SUBJECT: NOTIFICATION OF EXCEEDANCES WASHINGTON NAVY YARD,
NPDES PERMIT NUMBER DC000141

Naval Support Activity Washington is submitting this letter as the written Notification of Exceedances in accordance the National Pollutant Discharge Elimination System (NPDES) permit number DC0000141. NAVFAC became aware of the two exceedances during a routine records review, conducted on April 23, 2015. This review was conducted in preparation for the submittal of the Discharge Monitoring Reports (DMRs) for the monitoring period February 22, 2015 to March 21, 2015. NAVFAC Washington contacted EPA NPDES Enforcement by phone on April 24, 2015 to report the following exceedances. Follow up discussions were conducted on April 27, 2015. The following is a written account of the exceedances:

a. NPDES Outfall 001E: A valid rain event occurred on the WNY on March 14, 2015. Samples were collected and analyzed in accordance with the Permit DC0000141. A grab sample taken at outfall 001E was analyzed for Total Copper. The result was 323 ug/L. The permit limit is 91 ug/L. The duration of the exceedance appears to be intermittent and associated with larger less frequent rain events.

b. NPDES Outfall 008: A valid rain event occurred on the WNY on March 14, 2015. Samples were collected and analyzed in accordance with the Permit DC0000141. A grab sample taken at outfall 008 was analyzed for Total Copper. The result was 121 ug/L. The permit limit is 114 ug/L. The duration of the exceedance appears to be intermittent and associated with larger less frequent rain events.

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In addition, NAVFAC conducted a review of previous DMR data. During this review it was determined that an exceedance occurred on April 14th of 2014. The corresponding sampling data was reported via NETDMR in Discharge Monitoring Reports for the March 21, 2014 to June 22, 2014 monitoring period. However the exceedance was not noted on the DMR. The error was an oversight. Once the error was identified, NAVFAC Washington notified EPA Region III, NPDES Enforcement of the exceedance on April 24, 2015 and had follow on discussions with NPDES Enforcement on April 27, 2015. NAVFAC has taken steps to ensure our contractor support personnel fulfil their existing contractual requirements to notify the Navy within 24 hours of receiving lab results that indicate an exceedance has occurred and to indicate the exceedance has occurred on the Discharge Monitoring Report before draft Discharge Monitoring Reports are submitted to the Navy for review. The following is a written account of the exceedance:

a. NPDES Outfall 001E: A valid rain event occurred on the WNY on April 15, 2014. Samples were collected and analyzed in accordance with the Permit DC0000141. A grab sample taken at outfall 008 was analyzed for Total Copper. The result was 101 ug/L. The permit limit is 91 ug/L. The duration of the exceedance appears to be intermittent and associated with larger less frequent rain events.

The cause of the exceedances has not yet been determined. There have been no operational changes in the area that would result in evaluated copper discharges. The copper levels appear to be elevated during larger spring rain events. NAVFAC Washington will continue to evaluate sampling data and site conditions to determine any corrective actions needed and evaluate sources.

Sincerely,



DURANT S. GRAVES
Installation Environmental Program
Director
By direction of Commanding Officer